

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

CUTTING EDGE VISION, LLC,  
an Arizona Limited Liability Company,

Plaintiff,

Civil Action No.: 6:22-CV-00285-ADA-DTG

v.

TCL TECHNOLOGY GROUP  
CORPORATION, TCL ELECTRONICS  
HOLDINGS LIMITED, TCL  
COMMUNICATION TECHNOLOGY  
HOLDINGS LIMITED, and TCL  
COMMUNICATION LIMITED,

Defendants.

TRIAL BY JURY DEMANDED

**JOINT STIPULATION REGARDING BUSINESS RECORDS**

Plaintiff Cutting Edge Vision, LLC (“CEV”) and Defendants TCL Technology Group Corporation, TCL Electronics Holdings Limited, TCL Communication Technology Holdings Limited, and TCL Communication Limited (collectively, “TCL”) hereby stipulate as follows:

For the purposes of this litigation to streamline the case, and to moot the need for “testimony of the custodian or another qualified witness,” the documents bates labeled TCT-CEV-00000001-121 and TCT-CEV-00000131-0628 are “Records of a Regularly Conducted Activity” of TCT Mobile (US) Inc., under Rule 803(6) of the Federal Rules of Evidence because (A) those records were made at or near the time by — or from information transmitted by — someone with knowledge; (B) those records kept in the course of a regularly conducted activity of a business,

organization, occupation, or calling, whether or not for profit; (C) making the records was a regular practice of that activity; (D) all these conditions are shown by the testimony of the custodian or another qualified witness, or by a certification that complies with Rule 902(11) or (12) or with a statute permitting certification; and (E) neither the source of information nor the method or circumstances of preparation indicate a lack of trustworthiness.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

**RIMON P.C.**

/s/ David N. Deaconson

David N. Deaconson  
Texas Card Bar #05673400  
PAKIS, GIOTES, PAGE &  
BURLESON, P.C.  
P.O. Box 58  
Waco, TX 76703-0058  
(254) 297-7300 Phone  
(254) 297-7301 Facsimile  
[deaconson@pakislaw.com](mailto:deaconson@pakislaw.com)  
*Local Counsel for Plaintiff*  
and

Justin J. Lesko  
IL Bar No. 6306428  
*Admitted Pro Hac Vice*  
Steven G. Lisa  
IL Bar No. 6187348  
*Admitted Pro Hac Vice*  
55 East Monroe Street, Suite 3800  
Chicago, IL 60603  
Tel.: (480) 442-0297  
[JustinLesko@patentit.com](mailto:JustinLesko@patentit.com)  
[SteveLisa@patentit.com](mailto:SteveLisa@patentit.com)

Eamon Kelly  
IL Bar No. 6296907  
*Admitted Pro Hac Vice*  
SPERLING & SLATER, PC  
55 West Monroe Street, 32<sup>nd</sup> Floor  
Chicago, IL 60603  
Tel.: (312) 641-3200

/s/ Jason Liang Xu

Jason Liang Xu (*pro hac vice admitted*)  
DC Bar No. 980531  
1990 K Street NW, Suite 420  
Washington, D.C. 20006  
Telephone/Facsimile: (202) 470-2141

Thomas Fawell  
Texas State Bar No. 24118098  
700 Milam Street, Suite 1300  
Houston, TX 77002  
Telephone/Facsimile: (832) 404-2051

Eric Cohen (*pro hac vice admitted*)  
P.O. Box B113  
150 Fayetteville St., Suite 2800  
Raleigh, NC 27601-2960  
Telephone/Facsimile: (919) 825-4877

*Counsel for Defendants TCL Technology Group Corporation, TCL Electronics Holdings Limited, TCL Communication Technology Holdings Limited, and TCL Communication Limited*

Fax: (312) 641-6492  
ekelly@sperling-law.com

*Lead Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above document has been delivered to all counsel of record through the Court's CM/ECF service on this 31<sup>st</sup> day of August, 2023.

/s/ David N. Deaconson

David N. Deaconson